

Michael F. Buchanan, Esq. (NJ049041992)
PATTERSON BELKNAP WEBB & TYLER LLP
1133 Avenue of the Americas
New York, New York 10036
Tel: 212-336-2000

*Attorneys for Defendant
American Council of Learned Societies*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

-----X	
JOSHUA KATZ,	:
	:
Plaintiff,	:
	:
- v. -	:
	:
AMERICAN COUNCIL OF LEARNED	:
SOCIETIES,	:
Defendant.	:
	:
	:
	:
	:
-----X	

**Civil Action No. 1:21 CV 04306
(AET)**

MOTION DAY: June 7, 2021

**AMERICAN COUNCIL OF LEARNED SOCIETIES’
NOTICE OF MOTION TO DISMISS PLAINTIFF’S COMPLAINT**

PLEASE TAKE NOTICE that Defendant American Council of Learned Societies (“ACLS”), by and through its undersigned counsel, will and does hereby move this Court before the Honorable Judge Anne E. Thompson, at the United States District Court for the District of New Jersey, 402 East State Street, Trenton, New Jersey 08608, for an Order pursuant to Rules 12(b)(2) and 12(b)(6) of the

Federal Rules of Civil Procedure dismissing the Complaint of Plaintiff Joshua Katz for lack of personal jurisdiction, or in the alternative, failure to state a claim upon which relief can be granted, and for such other relief as the Court deems just and proper. The grounds for this motion are set forth in the accompanying Memorandum of Law in Support of ACLS's motion.

Dated: April 2, 2021

PATTERSON BELKNAP WEBB &
TYLER LLP

By: /s/ Michael F. Buchanan

Michael F. Buchanan
1133 Avenue of the Americas
New York, NY 10036-6710
Telephone: (212) 336-2000
E-mail: mfbuchanan@pbwt.com

*Attorneys for Defendant
American Council of Learned Societies*

CERTIFICATE OF SERVICE

I, Michael F. Buchanan, hereby certify, pursuant to 28 U.S.C. § 1746, that on April 2, 2021, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will automatically send e-mail notification of such filing to all counsel of record.

Dated: April 2, 2021

PATTERSON BELKNAP WEBB &
TYLER LLP

By: /s/ Michael F. Buchanan

Michael F. Buchanan
1133 Avenue of the Americas
New York, NY 10036-6710
Telephone: (212) 336-2000
E-mail: mfbuchanan@pbwt.com

*Attorneys for Defendant
American Council of Learned Societies*